

EXHIBIT C

Declaration of Justin D. Kobay, CPA, sworn to March 11, 2022

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

<p>SEKETHA WONZER and KEVIN DOZIER,</p> <p style="text-align:center">Plaintiffs,</p> <p style="text-align:center">-against-</p> <p>DANIEL HERNANDEZ a/k/a Tekashi 6ix 9ine,</p> <p style="text-align:center">Defendant.</p>	<p>Case No. 1:20-cv-10836-JPC</p> <p>Judge John P. Cronan Magistrate Judge Jennifer E Willis</p>
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DECLARATION OF JUSTIN D. KOBAY

JUSTIN D. KOBAY, being duly sworn, deposes and states as follows:

1. I am a Certified Public Accountant and a partner in LL Business Management, Inc. and Seckendorf Hasson Reilly & Kobay CPAs LLC.
2. I have served as the business manager and accountant for Daniel Hernandez p/k/a Tekashi 6ix 9ine ("Defendant") since 2018. I am responsible for managing the financial accounts for Defendant and various entertainment companies that furnish his services as a recording artist, and for live concerts and touring, merchandising and music publishing.
3. My firm's practice specializes in handling accounting and business management for musical artists and other entertainers.
4. I make this declaration upon my personal knowledge as part of Defendant's submission to this Court's post-default inquest on damages.
5. I have reviewed Defendant's personal finances and have created a spreadsheet concerning the same to establish for this Court a clear and honest picture of

Defendant's present financial situation. A copy of the spreadsheet is attached hereto as Exhibit A.

6. The spreadsheet shows the income coming into Defendants accounts as well as the moneys paying out of that account on a monthly basis.

7. Plaintiffs' statement that Defendant made "millions upon millions of dollars in net income" is completely misleading.

8. The spreadsheet shows that Defendant made significant income in 2018-2020, mostly attributable to advances he received under his recording artist agreement, the last of which was paid in late 2020 where he was paid \$3 Million. Under Defendant's agreements with his record label and merchandising licensee, those advances must be recouped before Defendant is paid any royalties from the sale of his records. As of the end of 2021, the Defendant's royalty accounts are significantly unrecouped.

9. The Defendant was incarcerated from November 2018 to August 2020 (home confinement accounted four months of that).

10. In 2021, since Defendant was not touring or releasing new music while he was incarcerated, and for the next 1-1/2 years after his release, his income declined to the point where, for 2022 (January – March), total income from all sources was only \$27,816.

11. Defendant's net monthly income is currently \$2,318.

12. I am unaware of any other assets of Defendant besides his royalty stream or advances from entertainment companies. I am not aware of any ownership of any securities, copyrights, realty or other assets owned by Defendant or any of his entertainment companies.

13. Defendant's current liabilities, including past due taxes, are greater than his assets. Therefore, his net worth is technically less than zero.

14. Finally, Defendant supports his two infant children, and their mother, as well as Defendant's mother and brother.

15. If this Court were to award the \$564,000 in compensatory damages to each Plaintiff and/or award punitive damages using the proposed 9.52 to 1 multiplier, Defendant would be rendered insolvent and would immediately have to file for bankruptcy relief. He would be unable to cover the third-party expenses he presently pays for his family members and indeed could not support himself any longer.

16. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 11th day of March 2022, at Lake Success, New York.

DocuSigned by:

Justin Kobay

JUSTIN D. KOBAY, CPA

EXHIBIT

	2018		2019		2020		2021	2022 (2 months)
69ENT INCOME	\$	860,000.00	\$	2,000,000.00	\$	9,629,943.23	\$	187,500.00
69ENT EXPENSES	\$	239,248.46	\$	290,577.26	\$	1,568,717.94	\$	571,753.18
NET	\$	620,751.54	\$	1,709,422.74	\$	8,061,225.29	\$	(384,253.18)
69TOUR INCOME	\$	842,375.00	\$	-	\$	148,769.27	\$	641,091.01
69TOUR EXPENSES	\$	473,809.07	\$	112,325.29	\$	187,480.06	\$	136,503.08
NET	\$	368,565.93	\$	(112,325.29)	\$	(38,710.79)	\$	504,587.93
69PUB INCOME	\$	1,219,179.35	\$	183,525.56	\$	75,129.25	\$	12,533.73
69PUB EXPENSES	\$	80,999.41	\$	3,207.38	\$	652.38	\$	445.99
NET	\$	1,138,179.94	\$	180,318.18	\$	74,476.87	\$	12,087.74
MONTHLY INCOME (2022)		2,318.65						
(average 12 months)								